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State of Maine Public Drinking Water Commission 2010 Annual Report

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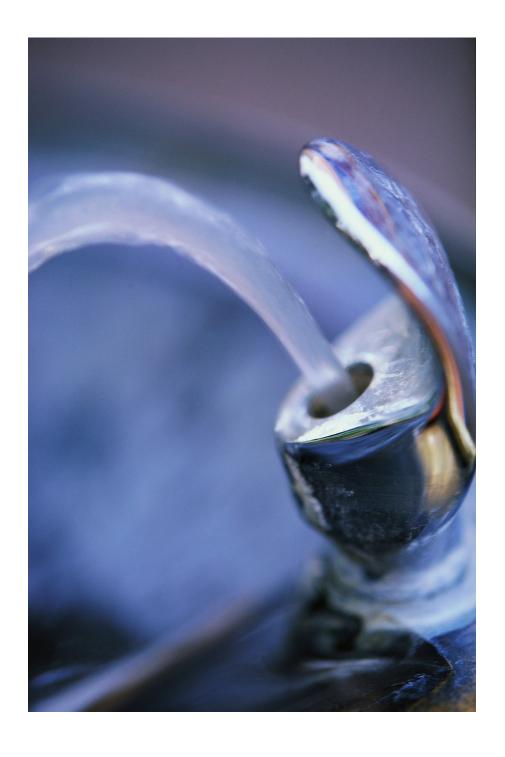
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STATE OF MAINE PUBLIC DRINKING WATER COMMISSION



2010 Annual Report Year Ending June 30, 2010

Annual Report of the Maine Public Drinking Water Commission

for the period ending June 30, 2010

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Introduction

The Annual Report of the Maine Public Drinking Water Commission (MPDWC) has been prepared for the Commissioner of the Department of Health and Human Services pursuant to Title 22 MRSA Section 2660-C 4th. The purpose of the report is to provide the Commissioner with an understanding of the issues the MPDWC and the Maine CDC 's Drinking Water Program (DWP) have dealt with during the last year and to outline the goals and work for the upcoming year. This report contains information about the DWP and its operations, with reports from the DWP Director and the Compliance and Enforcement, Field Inspection, Water Resources and Information Management Teams. Background information about the regulated water systems is also provided, along with the current fee structure in place and an explanation of the Drinking Water State Revolving Fund. Copies of this Annual Report are also submitted to the members of the Health and Human Services Committee of the Maine Legislature.

Enabling Legislation

Legislation relating to the MPDWC is found in Title 22 MRSA § 2660-B et seq. The statutes were first established in 1993(c.410) and have been modified five times since (1995.c.581: 1995.c.21: 1997.c.705: 2001.c.232 and 2003.c.601).

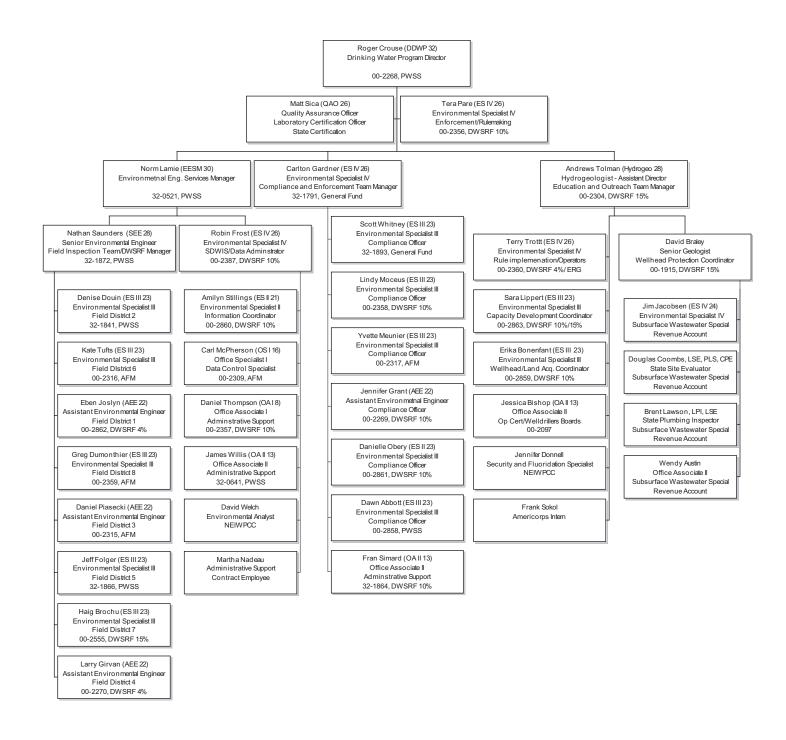
The legislation includes Definitions, Membership Requirements, Chair Responsibilities, Duties, Compensation, an annual work plan submission to the DHHS Commissioner and the Authority to impose an annual public water system operation fee.

Members of the Maine Public Drinking Water Commission

	Cost #	Chakubama Duaz-i-i f
Name, Address, E-Mail	Seat #	Statutory Provisions for
	Expiration Date	Seat
Roger L. Crouse, P.E. Director, Maine CDC Drinking Water Program 11 State House, Station Augusta, ME. 04333-0011 287-5684 FAX 287-4172 E-mail: roger.crouse@maine.gov	Seat 1 Until Replaced	Commissioner of Health and Human Services or the Commissioner's designee
Rebecca Laliberte The Meadows PO Box 629 Greene, ME 04236 946-3007 E-mail: RLalib3967@aol.com	Seat 2 August 31, 2010	Represent the water purveying community and be associated with a public water system serving a population of not more than 1,000.
Thomas J. Brennan, C.G., <u>Chairperson</u> Nestle Waters North America – Poland Springs 123 Preservation Way Poland Spring, Maine 04274 998-6350 ext. 6350 FAX: 998-5181 E-mail: <u>thomas.brennan@waters.nestle.com</u>	Seat 3 August 31, 2009	Must represent the drinking water public
Robert N. MacKinnon, Jr. Yarmouth Water District, Superintendent PO Box 419, 14 Smith Street Yarmouth, ME 04096 846-5821 FAX 846-1240 E-mail: ywdbob@maine.rr.com	Seat 4 August 31, 2010	Represent the water purveying community and be associated with a public water system serving a population of at least 1001, but not more than 10,000.
Vacant	Seat 5	Represent the water purveying community and be associated with a public water system serving a population greater than 10,000.
Allen York 221 Lakewood Road Madison, ME 04950 474-7353 E-mail: yonderhill@beeline-online.net	Seat 6 August 31, 2009	Must be a user of a transient, non-community water system
Harvey A. Chesley, Jr. 25 Hill Crest Drive Clinton, ME 04927 397-2141 FAX 397-5324 E-mail: ptchc@gwi.net	Seat 7 August 31, 2008	Must be a user of a non- transient, non-community water system
George Dugovic PO Box 603 Alfred, ME 04002 324-0180 E-mail: dugovics@roadrunner.com	Seat 8 August 31, 2010	Must represent the drinking water public
Vacant	Seat 9	Must represent the drinking water public

DRINKING WATER PROGRAM, DIVISION OF ENVIRONMENTAL HEALTH, MAINE CDC ORGANIZATIONAL CHART

July 15, 2010



Performance Review of the Drinking Water Program

The MPDWC gets regular updates from the DWP, and assesses the performance of this State agency. Despite shut-down days and suspended merit increases, the Director and the staff of the program are performing extremely well, given the ongoing budget and staffing constraints. Regulations and reporting requirements for drinking water systems continue to evolve and increase under the direction of the EPA, and the DWP continues to handle these increased responsibilities, although not without its challenges. In addition, the DWP has done an excellent job in implementing and administering the new ARRA/economic stimulus funds over the past year, and is ahead of other states in this area. Organizational changes made within the program over the past few years continue to improve service to Maine's water systems and allowed greater field work to insure the safety and reliability of our Maine water systems.

Alternative Funding Mechanism

In 1993, the Legislature created legislation enabling the DWP to assess a fee on all public water systems. This fee is deposited in the Public Drinking Water Fund for the purpose of supporting the DWP. The fee, also known as the Alternative Funding Mechanism, on each water system is determined using a formula with a base rate and a population multiplier.

The Alternative Funding Mechanism pays the costs of five full-time employees. Each year the MPDWC reviews the formula, the base fee, the per capita fee and the DWP budget to determine if any changes need to be made to the formula or fee rates. Revenues derived from the collection of these fees are used to retain primacy, or maintaining state control of the DWP, including funding five DWP staff positions.

The fee is equal to the minimum fee plus the per capita rate, multiplied by the population capacity of the system, minus the exempt population.

One formula and rate structure is used for community (C), non-transient, non-community (NTNC) and transient, non-community (TNC) water systems. A summary of the rate structure for these types of water systems can be found in Table 1 below.

Table 1 – Rate Structure for Transient, Non-Community	• •	ent, Non-Community and
	SFY 2010	SFY 2011
Per capita rate (above base population)	\$0.40	\$0.45
Base fee	\$45	\$50
Maximum fee	\$30,000	N/A*
Base population	100	100
* During the 2009 Legislative	Session the Legislature ren	moved the maximum fee cap from

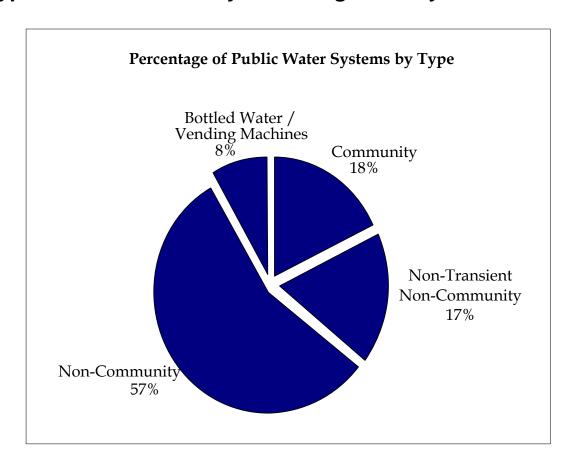
statute.

A separate formula and rate structure exists for bottled water facilities and water vending machines. A summary of the rates for these facilities can be found in Table 2 below.

Table 2 – Rate S	tructure Bottled V	Vater Facilities		
System Type	Description	# of Systems	SFY 2010	SFY 2011
In-State Small	Small (up to 250,000 gallons)	12	\$65	\$75
In-State Medium	Medium (>250,000 to 20 Million gallons)	10	\$200	\$225
In-State Large	Large (>20 Million gallons)	7	\$2600	\$2900
Out-of-State	Out-of-State bottlers selling product in Maine	109	\$260	\$300
Water Vending Machine	Per Water Vending Machine	34	Minimum \$65, \$15 per machine up to \$200 maximum	Minimum \$75, \$20 per machine up to \$220 maximum

During the May 5, 2010 Commission meeting, the MPDWC voted unanimously to increase fees for State Fiscal Year to ensure revenue met expenditure levels. Tables 1 and 2 reflect the increased fee rates. The rate increase represents an approximately 12 percent rate increase. The MPDWC anticipates not needing a rate increase for the next three years.

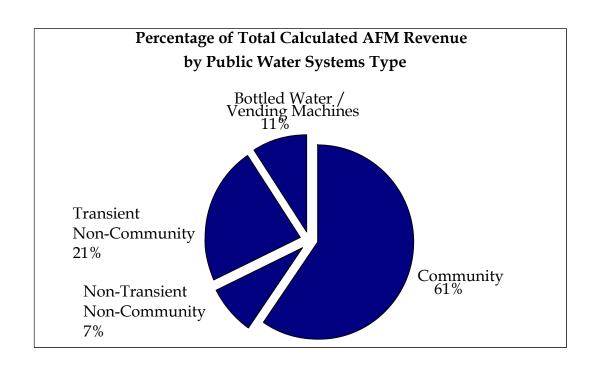
Types of Public Water Systems Regulated by the DWP



Fee Billings and Collections

State Fiscal Year 2010 Summary of AFM Fee Billings Data as of April 2010

Types of PWS	Number of Public Water Systems	% of total Public Water Systems	Population Served	culated enue	% of Total Calculated Revenue
Community	379	18%	663,312	\$ 269,962	61%
Non-Transient Non-Community	363	17%	68,344	\$ 32,117	7%
Non-Community	1,171	57%	184,416	\$ 89,927	21%
Bottled Water / Vending Machines	172	8%	N/A	\$ 49,785	11%
Totals	2,078	100%	912,819	\$ 441,791	100%



Drinking Water State Revolving Fund

The Drinking Water State Revolving Fund (DWSRF) provides financial assistance to public water systems in Maine for infrastructure improvements. From 1997 through 2009, the DWSRF has provided nearly \$150 million in loans and grants to public water systems throughout Maine.

The DWSRF Program in SFY 2010 continued the tremendous success of 2009. In August 2009, Maine became the first State Revolving Fund in the nation to commit all American Recovery and Reinvestment Act (ARRA) funds to construction projects. Maine continues to lead the nation in percentage of ARRA funds spent with more than 90 percent of the funds spent by the end of SFY 2010.

In 2010 Congress increased the national commitment to the DWSRF program resulting in Maine being eligible for over \$13.5 million. In June 2010, voters approved a \$3.4 million bond package for the DWSRF State Match. Although this \$3.4 million was originally intended to provide State Match for two years, with the increased appropriations from Congress, the Maine DWSRF Program needed approximately \$5.4 million for the two years. Attempts to secure the additional State Match through the 2010 Legislative Session were unsuccessful.

Maine received over \$40 million in requests for the 2010 DWSRF. However, even with the increased allotment, only about \$18 million worth of projects will be funded with the 2010 DWSRF.

In addition to funding construction projects, the DWSRF also funds many other activities approved by the U.S. Environmental Protection Agency including well head protection

grants, technical assistance providers, operator training, land acquisition loans, source water protection resources, and 17 staff positions at the Drinking Water Program.

DWP Program Accomplishments and Goals

Director's Report

Responsibilities

- Provide program direction and leadership.
- Develop staffing and budgetary needs to meet primacy requirements.
- Provide DWP Staff with the resources to effectively perform their work.
- Set priorities for staff time and resources.
- Adopt drinking water regulations that are no less stringent than the federal regulations.
- Adopt and implement adequate procedures for the enforcement of State regulations.
- Provide technical assistance to PWS to assure compliance with the SDWA.
- Work with state and federal entities to ensure adequate funding of the DWP.
- Advocate for Safe Drinking Water.
- Ensure the state lab's ability to perform analytical measurements of all National Primary Drinking Water Regulations.
- Work with Department Leadership to maintain and when possible increase support for the DWP.
- Respond as needed to all proposed legislation that affects the ability of public water systems to provide safe and reliable drinking water.

- The 2009-2010 construction season was challenging to the Drinking Water Program staff. Access to the American Recovery and Reinvestment Act (ARRA) combined with a larger than normal Drinking Water State Revolving Fund provided approximately \$40M, and greatly increased the number of infrastructure projects undertaken. Because of the urgency to create/retain jobs quickly, ARRA included a goal of having at least 50 percent of the funds under contract within 102 days (June 17, 2009) and 100 percent of the funds under contract by February 17, 2010. Maine was one of only two DWSRF programs nationally to meet the June 17, 2009 goal and Maine was the first SRF program in the Nation to have all ARRA funds under contract (August 2009). As of June 2010, the Maine Drinking Water Program leads the nation in completing ARRA projects with 91% of project funds having been completed.
- Applied for 2010 DWSRF grant (\$13,573,000). Award anticipated by the end of July 2010.
- Filled all vacant positions including the positions vacated due to five retirements.
- Hired a new Chief Engineer/ Information Management Team Leader
- Received annual Public Water System Supervision Grant (\$900,000).
- Our Information Management Team has continued to increase our data reliability.
- The Information Management Team has taken on more of the routine tasks from the

Compliance and Enforcement Team, enabling the Compliance Officers to focus more of their time on working directly with water systems owners and operators.

- Maintained a strong, committed workforce.
- Continued to foster strong relationships with EPA, state agencies, water utilities, water associations, and non-profit agencies.
- Maintained compliance with all primacy requirements.
- Staff participated on many state and national boards, commissions and workgroups.
- Worked to address several legislative initiatives dealing with groundwater ownership.
- With the help of the Office of Information Technology, the DWP continued implementation of an imaging system to eliminate most of the paper filing system.
- Executed a Co-Sponsor Agreement with EPA Region 1, Joint Environmental Training Coordination Committee, Maine Water Utilities Association, Maine Wastewater Control Association, Maine Rural Water Association, Efficiency Maine, and Maine Department of Environmental Protection to co-sponsor the Maine Energy Management Initiative for Water and Wastewater Utilities.
- Worked with other Programs in the Division of Environmental Health to find efficiencies and provide better customer service. Most visible improvement was the creation of a common reception area for the Division. All main lines are now answered in one central area enabling the public to reach a live person everyday from 8 to 5. A Division Reception Area Staff Plan was developed to ensure that the reception area is staffed during all normal business hours. The Division also developed an improved payment receipt process to reduce the risk of loss of funds and for the protection of those who handle the funds.

Goals

- Continue to implement the Safe Drinking Water Act with an estimated 50 percent of the needed workforce. The DWP will continue to be creative and efficient. In particular, we will compare the work we are doing with our statutory authority to ensure we are operating within the authority given to us.
- Evaluate other ways of securing State Match for the DWSRF Program. Make recommendations to the MPDWC, DHHS and the Legislature.
- Continue to work with Division of Environmental Health management team to find efficiencies through inspection and administrative staff.
- Work with contractors and other water industry partners to improve outreach and technical assistance to public water systems.
- Work with the Department as needed on proposed legislation.
- Work with the Drinking Water Commission to support initiatives of the DWP.
- Submit comments on the proposed Revisions to the Total Coliform Rule.
- Maintain and promote good staff morale.
- Provide staff with the necessary resources and support so they can accomplish their work.
- Provide excellent customer service.
- Maintain and foster strong alliances and working relationships.
- Strive for Continuous Program Improvement.
- Continue to shape state and national drinking water policy.

Compliance and Enforcement Team

Responsibilities

- Administer and enforce all State and federal safe drinking water rules and regulations promulgated from the Safe Drinking Water Act and Maine Water for Human Consumption Act, including the Maine Rules Relating to Drinking Water (10-144 CMR 231) and the Code of Federal Regulations (40 CFR 141, 142, and 143).
- Adopt New EPA Regulations and File the necessary Primacy Packages.
- Administer and Enforce the State of Maine Rules Relating to Bottled Water, Bulk Water, and Water Vending Machines.
- Identify any rule violations, input appropriate violation data, and notify public water systems of such violation(s) through notices of violation, notices of noncompliance, consent orders, compliance orders and notices of penalty assessment.
- Create and change monitoring schedules for public water systems.
- Train public water system owners and operators on new, existing, or upcoming rules and procedures.
- Review water quality and monitoring data from public water systems and bottled water producers and sellers, to determine contaminant levels, appropriate collection and analysis times, as well as sample site methods and locations. This review includes reviewing submitted reports like monthly operating reports and consumer confidence reports.
- Issue and Remove Boil Water Orders, Boil Water Advisories and Do Not Drink Orders.
- Track water quality results for new source/system approval.
- Conduct watershed inspections and review watershed reports.
- Communicate internally and externally with DWP staff and State and federal agencies and stakeholders regarding any relevant compliance and enforcement information associated with public water system issues, applications, or reviews.
- Review and approve or deny treatment installation plans affecting water quality.
- Review and approve or deny sampling plans and synthetic organic compound waivers.
- Enforcement staff draft, negotiate, and revise formal enforcement actions.
- Enforcement staff works directly with public water systems and other state agencies to explain and resolve formal enforcement actions related to violations of the SDWA, collect AFM fees, assist with posting public notification and negotiate terms for returning to compliance.
- Enforcement staff refers any recalcitrant public water systems to the Maine Attorney General Office and provide testimony, background, and technical expertise for administrative and civil hearings.
- Enforcement & Rulemaking Coordinator oversees and ushers all proposed rule changes within the Division of Environmental Health through internal approval, advertising, public hearing, and the adoption process.
- Enforcement & Rulemaking Coordinator oversees all public requests for information and ensures compliance with Maine's Freedom of Access Act.

Accomplishments

- Compliance and Enforcement Team members continued their work participating in task forces (subgroups) to address areas of the program identified as needing improvement, including clarifying roles and responsibilities within the DWP; expediting enforcement efforts against public water systems; setting and following through with goals and measurements; developing methods to consistently update and purge written documents; and securing and improving database reliability and automation, consistency, and accuracy.
- Enforcement staff provided input on EPA's new Enforcement Targeting Tool, designed to prioritize unaddressed public water systems with health-based violations.
- Compliance staff provided input on EPA's National Advisory Committee on proposing changes to the Total Coliform Rule.
- Compliance officers participated in a series of trainings to assist public water systems with complying with existing and upcoming regulations affecting their systems, including but not limited to the Arsenic Rule, Opening for the Season, Lead/Copper Rule, and implementation of the Groundwater Rule, which became effective December 1, 2009.
- Compliance staff adeptly responded to a number of drinking water emergency calls and events, resulting from weather disasters, lack of water, acute contamination and treatment failures.
- The *Rules Relating to Drinking Water* (10-144 CMR 231) was revised, with changes effective on November 30, 2009.
- Compliance and enforcement staff provided thoughtful feedback and input on all proposed policies and procedures by DWP staff and worked to ensure that final policies first protected public health and then improved workplace efficiencies.
- Compliance and enforcement staff implemented a system of coverage for the office that ensures that *E. coli* and total coliform positive results reported from certified labs receive prompt attention.
- Trained certified labs on reporting results electronically, which has improved data reliability if a human is not required to manually enter data.
- Continued to improve the process of receiving information from public water systems, communicating that information to all appropriate staff, and storing it in an easily retrievable format, when necessary.
- Improved communication internally within the DWP to present a consistent message to public water systems.
- Trained two new compliance officers who replaced two positions (arrivals in September 2009 and March 2010).
- Provided refresher trainings for existing compliance staff on regulations and SDWIS.

Goals

• Implement proposals for expedited and more effective administrative enforcement, including imposing collection fees for public water systems failing to collect samples in the required timeframes, posting a list of public water systems in violation of particular violations, rewarding public water systems in compliance, along with other efforts that will encourage public water systems to be in compliance. One effort

- will entail a pilot project of the 25 worst transient offenders, in order to test the Program's procedure for tracking and implementing imposing collection fees for samples missed.
- Work with the Information Management Team to develop stronger tracking efforts in compliance follow-up.
- Work with the new SNC tool, offer feedback and determine which public water systems require action first.
- Continue efforts to collaborate with other State agencies to offer a more cohesive message to public water systems and avoid confusion. Specific emphasis will be placed on day care facilities and restaurants.
- Continue to improve internal processes that directly affect compliance, in order to maintain data integrity and secure the highest accuracy of rule compliance.
- Update the Enforcement Strategy to better reflect more efficient enforcement efforts to be implemented and incorporate clearer roles and responsibilities for enforcement and compliance staff.
- Update any state rules under the jurisdiction of the DWP that need it. Currently on the agenda are the Rules Relating to Bottled Water, Bulk Water, and Water Vending Machines, Rules Relating to the Licensure of Water Treatment Plant Operators, and Rules Relating to Drinking Water.
- Apply for primacy for the Ground Water Rule Create updated forms, letters, policies, and standard operating procedures for these new changes.

Field Inspection Team

Responsibilities:

- Conduct sanitary surveys and field investigations.
- Oversee new system and new well approval projects for public water supply wells.
- Work with public water systems to complete the process for obtaining a general operations permit.
- Review proposed septic system variances that could impact public water supply sources
- Provide follow up inspections and field technical assistance to PWSs with violations.
- Provide on-site advice and assistance to PWSs regarding operation, maintenance, treatment, quality control, testing waivers and testing requirements.
- Investigate water quality complaints made by the public.
- Provide technical advice to PWSs in emergency situations.
- Provide waterborne disease investigation.
- Investigate requests for deregulation and authorize deregulation of water system as warranted.
- Maintain a Sanitary Survey Priority List.
- Draft, issue, and track Engineering Orders.
- Inform and interact with all other pertinent DWP sections regarding field conditions of PWSs.
- Provide field assistance on the placement and removal of all Boil Water Orders.
- Inspect the construction of PWS facilities, both DWSRF and non-DWSRF funded.
- Conduct watershed inspections.

- Evaluate water system's operator classification.
- Review and provide comments on preliminary plans and engineering reports for PWSs.
- Review and approve final plans and specifications for new or modified water facilities.
- Provide engineering assistance and guidance to PWSs.
- Provide assistance and guidance on optimization of treatment processes.
- Review and approve all requests for waivers of main separation requirements and tank painting/coating.
- Review and approve all requests for waivers to the 300 foot setback requirement between a PWS well and septic leach field.
- Review and provide input on the approval of requests for waivers to the 1000 foot setback requirement between a PWS well and Underground Storage Tanks (USTs).
- Develop and maintain controlled documentation of pertinent policies and standard operating procedures.
- Conduct facility reviews and evaluate the ability of systems, both engineered and non-engineered, to provide safe and reliable drinking water to the public. Facility evaluations include sanitary surveys; new system and new well approval projects from preliminary approval through final system approval; records, data, performance reviews; and engineering inspections.
- Engineering enforcement actions are initiated and tracked as necessary.
- Conduct routine inspections of public water systems throughout fiscal year.
- Conduct additional inspections in response to violations, customer complaints, known health threats, siting and approving new public water supply wells and their water systems, or at the request of the system.
- Field Engineers oversee DWSRF projects as they proceed through the construction phase, starting with a preconstruction meeting and contract signing. During the construction phase, projects are inspected monthly in conjunction with pay requisition meetings. At the end of a project, an inspection is done to verify substantial completion and final pay requisitions.
- Review and evaluate new and emerging technologies, preliminary and final water system plans and specifications, engineering studies, engineering orders and pilot projects.
- Provide technical assistance to consulting engineers and public water systems regarding engineering issues. Inspect all facilities construction in a timely manner.

- In this fourth year after the DWP restructuring of 2006, the Field Inspection Team continues to see a reduction in the number of sanitary surveys due at any given time. Individual sanitary survey goals have been given to each inspector and results are reviewed on a quarterly basis.
- Approximately 371 sanitary surveys of public water systems were completed along with 389 other field visits relating to various activities including new system or well approval projects, sample rechecks, construction inspections, boil water orders, and miscellaneous events.
- Emergency responses, investigations, water system inspections, follow up inspections for Total Coliform Rule violations and the issuance of engineering orders

- were performed.
- In our efforts to work toward using an electronic sanitary survey process, and working with hardware challenges that have occurred, every field inspector now uses a standard sanitary survey question set at each survey, which is amenable to use in the electronic sanitary survey in the future. This change results in a standardization of items reviewed during every sanitary survey. The Field Inspection Team continues to work toward the creation of an electronic sanitary survey process where sanitary survey results are maintained in electronic format.
- Maintained the Electronic Field Manual which includes all pertinent policies and procedures related to field inspection activities. The manual is controlled and available for downloading onto electronic equipment brought into the field.
- Participated in the development or revision of several DWP policies including the underground storage tank setback waiver policy and the leach field setback waiver policy.
- The new system approval policy and procedure was revised to cover previously state licensed facilities and manufactured housing communities.
- A revision of the Maine Cross Connection Rules was completed this year. The DWP, along with the Plumbers Examining Board and key public water system personnel, held several training sessions on the new rule changes. Making these rule changes with input from the public and with the full support of the Plumber's Examining Board, has enabled a DWP rule change that works in conjunction with the State Plumbing Code to ensure cross connection control from source to tap.
- Field Inspectors oversaw the issuance of General Operations Permits for Community and Non Community – Non Transient public water systems that are new or have substantially changed their operation after October 1st, 1999.
- During sanitary surveys, field inspectors verified that public water systems have designated operators with licenses that are commensurate with the operational class of the system.
- During the 2010 fiscal year, the DWP received \$19 million in ARRA funds in addition to the annual \$8.2 million DWSRF grant. Combining these two grants, the DWP was able to fund 35 drinking water related construction projects ranging from \$45,000 to \$4.6M in scope. Four field inspectors worked as project mangers to oversee these projects to ensure that projects were constructed to safe drinking water standards and to verify that funds were spent appropriately for these projects. These projects involve: new sources or source modification, new storage facilities, new treatment or treatment modifications, and major transmission and distribution main work.
- Completed the plan review process for numerous water system projects.
- Completed watershed inspections on the State's water systems that have filtration avoidance approvals.
- The DWP's computer database records were updated to include information gained as a result of sanitary surveys and other inspections.
- Technical assistance activities continued to be enhanced through the use of documented policies and procedures. These have allowed the field staff to consistently and efficiently administer SDWA rules and State of Maine Rules Relating to Drinking Water.

Goals

- Continue to perform sanitary surveys on regulated water systems based on a threeyear/five-year rotation plan.
- Continue to monitor data on sanitary survey completion.
- Provide review and approval of new public water supply wells and water systems.
- Implement new Ground Water Rule requirements.
- Review septic setback waiver requests to ensure public health is protected.
- Review underground storage tank (UST) setback waiver requests to ensure public health is protected.
- Perform annual inspections of all surface water source systems with filtration waivers.
- Provide on-site technical assistance to small water systems.
- Provide on-site training to small water system operators.
- Complete construction inspections on all projects submitted for review.
- Respond to emergency situations including boil water orders.
- Conduct rechecks sampling for routine coliform positive samples.
- Complete plan reviews within 30 days of receipt of all necessary review information.
- Oversee the issuance of General Operations Permits.
- Continue the implementation of the Electronic Sanitary Survey.
- Implement updates to the Cross Connection Rules.
- Incorporate future EPA regulations into the review process.
- Ensure compliance with DWP rules regarding requirements of final plans and specifications submission and approval prior to the initiation of construction of water facilities by PWSs.
- Complete inspection forms for all construction inspections on DWSRF funded and non-DWSRF projects.
- Continue New System Approval work on Manufactured Housing Communities.
- Review, update, and modify, as necessary, all databases.
- Continue to use documentation control best practices with DWP policies and SOPs.
- Continue development of the DWP staff of eight field inspectors for both new system/well approval and field inspection work.

Water Resources Team

The Water Resources Team provides technical assistance, outreach and training for DWP staff, Public Water Systems, and the public. Areas where we focus that assistance include Water Operator and Well Driller licensing, System Capacity Development assessment and improvement, Security, Source Protection, and new regulations. We also now work with the Subsurface Wastewater Unit, and provide them with direction.

Responsibilities

- Participate in Maine's Board of Licensure of Water Treatment Plant Operators. This includes administration of exams and reviewing training courses for relevancy.
- Provide DWP support to the Board of Licensure of Water Treatment Plant Operators for license renewal, tracking of required training and examination process. (See annual Operator Certification Report for details.)

- Organize and conduct training for PWS owners, operators, and supervisors.
- Ensure that DWP personnel receive appropriate training related to their current and anticipated duties.
- Assist Field Inspection Team in evaluating water systems classification.
- Assist Field Inspection Team in assessing water system compliance with licensed operator requirements.
- Provide guidance and direction to MRWA's circuit riders. Administer charges to DWSRF 2% Technical Assistance
- Perform Environmental Review cross-cutter information for DWSRF funded projects and prepare an Environmental Assessment.
- Review DWSRF recipient systems' technical, financial and managerial procedures to address system capacity
- Inform PWS management of methods to improve capacity development.
- Utilize and monitor the Security Grant to assist the DWP and Public Water Systems in improving their security and emergency preparedness (See Security Grant reports for details).
- Disseminate *Emergency Response Handbooks* to assist systems in the development of plans for water system emergencies.
- Participate in the development of intrastate and interstate Water/wastewater Agency Response Networks, (WARN).
- Represent the DWP on the WARN Steering Committee as an associate member.
- Utilize and monitor the ERG grant to assist in training and administration of water operators. (See ERG grant reports for details).
- Manage and administer the Water Well Drillers' and Pump Installers' Board.
- Continue to implement a Source Water Assessment and Protection Program for Maine.
- Operate and maintain the DWP GIS.
- Make source water protection and security information available in appropriate forums, including the Internet.
- Provide maps depicting source water protection areas and water resource features to utilities, all affected municipalities, consultants, and others.
- Encourage and facilitate source water protection activities of public water systems.
- Market and administer the Land Acquisition Loan Program
- Administer Maine's Wellhead Protection Grant Program.
- Coordinate the DWP education and outreach program, including exhibiting at conferences, publishing a quarterly newsletter and maintaining the DWP website.
- Update and maintain the Subsurface Wastewater Rules to provide protection for public health and groundwater quality.
- Manage the Licensure of Site Evaluators.
- Coordinate and conduct training for Local Plumbing Inspectors, Code Enforcement Officers, and Licensed Site Evaluators with the State Planning Office.
- Provide support for and review of municipal programs for internal and external plumbing permits.
- Provide technical assistance, training, and interpretation of rules for municipalities.

- Assisted in the development of the Maine Water/Wastewater Agency Response Network (MEWARN) to provide assistance to water and wastewater utilities during times of emergencies. Assisted the MEWARN in developing promotional materials and a website.
- Achieved 97 percent compliance rate for the 760 PWS required to be operated by a licensed operator.
- Continued to provide opportunity for examination preparatory classes in order to increase operator availability.
- Conducted 2 capacity reviews for DWSRF loan applicants.
- Reimbursed 9 systems for projects through Capacity Development Grants; 7 projects are ongoing.
- Provided technical support for the general operations permitting process and operator compliance to the Field Inspection Team.
- Completed 30 environmental reviews in SFY 2010 due to AARA funding.
- Revised Capacity Development Strategy and developed an Implementation Plan to carry out the Strategy goals.
- Continued a joint project with Maine DEP and MRWA to assess land ownership around small community PWSs, and provide them with system security and source protection assistance.
- Worked with Maine DEP to implement the provisions of the new Wellhead Protection Act, restricting above-ground storage of petroleum and hazardous substances around water supplies.
- Worked with The Trust for Public Land to assess areas where state and local governments and other entities can work together to protect drinking water supplies.
- Worked with the Maine Conservation Corps to hire staff to conduct assessments of public water supplies brought on line since the completion of the assessments in 2003, and to work with those systems to develop source protection plans.
- Worked closely with the MECDC Oral Health Program to enhance water operator understanding of water fluoridation and increase monitoring and compliance with fluoridation rules.
- Increased communication with county emergency management agencies to help identify public water system strengths and weaknesses in developing and maintaining water system emergency preparedness plans.
- Worked with the Well Driller's Board to obtain legislative authorization to regulate geothermal well installation, and began the process of writing regulations.
- Processed consumer complaints, unlicensed practice investigations, and examinations of new well drillers for the Well Driller's Board. Worked closely with the DWP on the installation of proposed public water supply wells.
- Approved \$85,400 in Wellhead Protection Grants
- Approved more than \$2,250,000 for land acquisition to protect drinking water sources, including major projects involving collaboration with the Trust for Public Land.
- Distributed the *Service Connection* newsletter quarterly to more than 5000 readers
- Began the process of transitioning the DWP's quarterly newsletter, the *Service Connection*, to an electronic transmission to enable improved and upgraded design capabilities and save resources.

- Maintained DWP website to highlight rule changes, emergency information and resources for public water systems
- Exhibited at Maine Water Conference, Maine Municipal Association Annual Conference, Maine Water Utilities Association Annual Trade Show, and Maine Rural Water Association annual conference to promote safe drinking water and network with public and private stakeholder groups.
- DWP staff members provided training on the new groundwater rule, source water protection, D/DBP Stage 2, LT1ESWTR, LT2ESWTR, rule compliance, and emergency response planning to owners and operators of public water systems.
- Provided regular monthly oversight and direction to MRWA Water Quality Specialists (WQS) funded by the DWSRF technical assistance set-aside. With closer targeting and oversight, the WQS conducted 512 site visits. The site visits help water systems with violations, operator licensing, trouble-shooting, installing, and operating treatment systems.
- Worked with public water suppliers, Maine Rural Water Association, Maine Water Utilities Association, The George Mitchell Center, Maine NEMO, as well as other state agencies to facilitate the implementation of the recommendations resulting from the assessments. We are working with the State Planning Office to provide source protection education and information to municipal officials.
- Initiated site visits and provided System Design Capacity determinations to twenty public water systems for the water flow and level requirements associated with DEP Chapter 587.
- Staff serve on several Association of State Drinking Water Administrators, ASDWA, committees that work with other states, EPA, and professional organizations to develop guidance, build comments and perform studies for small system operations, security initiatives, water resource vulnerabilities and revisions to the Total Coliform Rule.
- Worked with the State of New Hampshire and Piscataqua Regional Estuarine Project to initiate an interstate planning process to improve protection of the Salmon Falls watershed, a drinking water source for both states. Secured assistance from the Sourcewater Collaborative, a national organization.
- Developed a preliminary tracking system to track education and outreach message delivery and materials development to measure effectiveness and shape future education and outreach actions.

Goals

- Continue to maintain the new mapping web site, providing downloadable GIS and assessment data to suppliers, municipalities, and the general public.
- Continue to implement the Trust for Public Land recommendations for improving the fabric of water supply protection in Maine.
- Develop alliances with land conservation groups and regional planners to encourage good land use planning leading to more effective source protection.
- Continue and expand education and outreach efforts to assist both water suppliers and municipalities in making good land use decisions in source water protection areas.
- Provide support and coordination with DEP, Land Use Regulation Commission, and other state agencies to assure that source water protection issues are considered in

- their permitting processes.
- Emphasize the need for active management plans in wellhead protection areas in source approval, waiver review, and consultation with systems.
- Continue to follow the Capacity Development Strategy Implementation Plan.
- Continue to streamline the environmental review process while maintaining a high integrity.
- Support the Board of Licensure of Water System Operators in their actions to maintain the professionalism of the water operator license.
- Provide staff and logistical assistance to the Well Drillers' and Pump Installers' Board, administering the examination, licensing, complaint, and discipline process.
- Develop a means to track documentation of training contact hours electronically for license renewals.
- Assist training organizations in the development and approval of relevant training for water system personnel.
- Develop outreach programs by staff to increase operator knowledge concerning regulatory requirements.
- Provide DWP staff members with training pertinent to their job performance and relationship to water system operations.
- Involve the Water Operator Board to make improvements to clarify operator responsibility in system compliance matters.
- Continue to aid community and non-transient, non-community systems in retaining appropriately licensed operators.
- Ensure systems requiring licensed operators have satisfactory coverage.
- Administer the Operator ERG with effort being placed on continuing education.
- Continue oversight of MRWA Circuit Rider program.
- Continue to improve and streamline the Grant administration process.
- Continue conducting DWSRF capacity reviews for capital projects.
- Continue conducting capacity reviews of those systems identified as particularly needing TFM capacity development improvements.
- Continue to provide capacity development grant money to assist systems in maintaining or improving TFM capacity.
- Work cooperatively with the PWS and the DWP compliance section to bring noncompliant systems into compliance.
- Enhance the capacity review documentation to address differences in system types and needs.
- Continue to balance the improvement of the human environment through safe and adequate water systems with the protection of natural, historical and cultural features.
- Finalize a procedure to address historical SNCs through capacity development.
- Provide technical assistance in the form of operator training and directed workgroups.
- Work with the Board of Licensure of Water System Operators to improve pass rates for water operator examinations.
- Support industry efforts to address water operator workforce sustainability.
- Continue to collaborate with professional organizations and State agencies that concentrate on post secondary and job training.
- Continue a presence on MWUA, NEWWA, JETCC, and other professional

- organization committees to enhance training opportunities and capacity development awareness.
- Continue working with PWSs to improve their emergency preparedness through interactive exercises.
- Participate in the development of the Maine WARN and an Interstate WARN.
- Raise awareness of emergency response procedures to all PWS.
- Distribute Emergency Response Handbooks to all systems in 2010. We also hope to partner with the Department of Education to disseminate information to schools for inclusion in their all hazard plans.
- Complete the rulemaking process to revise and update the Subsurface Wastewater Rules.
- Continue to work towards an electronic publication of DWP's quarterly newsletter, the *Service Connection*.
- Continue using the tracking system to track education and outreach message delivery and materials development and expand its use to entire DWP.

Information Management Team

Responsibilities

- Manage data flow into the DWP, both electronically and by hard copy this includes incoming and outgoing mail, sample data, MOR data, GIS data, AFM payments, etc.
- Manage and maintain Document Imaging system.
- Create and maintain database and GIS applications to support all functions of the DWP.
- Manage financial aspects of the DWP.
- Manage QA/QC processes of all DWP data.
- Manage New Source Approval / New Well Approval processes, including tracking and coordination between DWP personnel and other State agencies.
- Provide quarterly data to EPA.
- Run queries and provide data to EPA contractors, Maine CDC, other State agencies and for FOIA requests.
- Manage the Source Water Assessment program, including creating SWAP reports and maps.
- Create maps as requested to PWS and towns.
- Provide support and training to DWP staff for SDWIS, PDA/GPS units, and other technology.

- Implemented Document Imaging system (Kofax / Orbit) to replace paper files.
- Assisted staff in becoming familiar with SDWIS Web application. Maintaining production database on the enterprise server.
- Provided cross training to IMT staff for better coverage of all IMT duties.
- Expanded on existing training and guidance documents to staff (mostly FIT/CET) for SDWIS Web use.
- Began working more closely with the Health Inspection Program and Department of Agriculture to identify PWSs that are under their regulation.

- Maintained quarterly EPA reporting.
- Worked with the State Health and Environmental Testing Lab (HETL) staff to refine PWS sample kit shipping and sample data transfer processes.
- Provided private and utility labs with files and guidance documents to assist them in implementing electronic sample data transfer.
- Began working on an MS Access application to provide to small private and utility labs that will give them the ability to enter sample data and automatically and create a properly formatted electronic sample data file to provide to the DWP. The MS Access application is almost complete.
- Completed migration of Well Drillers into SWOCS by working with GEC to upgrade SWOCS to include Well Driller Companies.
- Began running Compliance Reports as support to Compliance Staff. As part of this process, IMT staff also began doing preliminary data investigation on the Compliance Reports.
- Continued to increase QA /QC of DWP data in all applications, including SDWIS.
 QA /QC of Legal Entities data has led to a significant decrease in returned mail on mass mailings.
- Provided training and support to FIT and CET groups in a variety of areas, including use of SDWIS.
- Added a contract Administrative Support position to assist with Administrative tasks, data cleanup projects, and Document Imaging.
- Provided support to the ARRA needs for reporting and tracking of projects and spending.
- Provided weekly updates for all DWSRF/ARRA projects
- Improved communication with the MMBB.
- Continued to work with SAIC to upgrade ESS Web for sanitary surveys.

Goals

- Maintain or increase the same level of service to the program, recognizing changes in staff and added responsibilities. Identify creative and more efficient ways to manage/QC/enter data to reduce overall staff time. Use contract labor as necessary to manage workload.
- Prepare for next SDWIS upgrade to implement the GWR changes and SDWIS updates. Provide training to staff in added SDWIS functionality for the GWR.
- Continue working with HETL to reduce the amount of rejected samples from electronic sample data transfer.
- Begin Imaging the files in the fileroom, with a goal of getting all the DWP's files into the Orbit Imaging Viewer over the course of two years.
- Make improvements to all DWP supporting applications (including the Shipping File process, HETL sample data import, AFM, Field Data, SRF, etc.).
- Develop a new application to automatically create Consumer Confidence Data Reports to provide to Community systems.
- Explore the use of SQL server as a replacement to MS Access, for DWP supporting applications. This may allow us to provide better access to supporting applications for DWP staff in field offices.
- Continue cross training of IMT staff for better coverage of all functions.
- Create and maintain SOP documents for all IMT functions.

- Continue assistance to private labs for electronic sample data transfer, with a goal of 50% of labs submitting samples electronically by SFY 2012.
- Maintain/increase QA/QC of all DWP data, including lab samples (units of measure, correct sample points), Inventory data, and Legal Entity data.
- Begin running Failure to Monitor Compliance Reports as support to Compliance Staff, from running the reports and doing data investigation, through printing and mailing the letters.
- Create and implement an efficient process for managing GIS and ESS data collected by FIT inspectors.
- Maintain routine GIS updates.
- Continue working with SAIC and OIT to finalize upgrade to SDWIS Web 2.3 for added GWR functionality and ESS capabilities.
- Work with FIT for continued acceptance of using ESS (field or desktop).
- Improve timeliness of Federal Violations Reporting.
- Continue creating SWAP reports for all PWSs that have not been assessed, and moving toward providing a report as each new system or well is brought online.
- Continue to provide support and training to DWP staff, including training for SDWIS Web 2.3 GWR functionality.
- Priority rank all New Source Approvals / New Well Approvals.
- Enhance the SRF application to priority rank project submissions for funding.

Laboratory Certification and Capability

Responsibilities

- Issues laboratory certificates that clearly reflect the analytical capabilities of participating laboratories.
- Provides technical assistance that results in improved quality and defensibility of analytical data generated by laboratories for use in the DWP.
- Develops, reviews and revises State rules and regulations for laboratory certification to clearly reflect consistency with the "Manual of Certification of Laboratories Analyzing Drinking Water" and recognized national standards on laboratory quality systems.
- Evaluates laboratory PT results to determine compliance with rule requirements.
- Maintains the central files which contain applications, certificates, audit reports, PT results and correspondence for all laboratories.
- Participates actively in the development of a national laboratory standard.

- Provided training and technical support to laboratories and the DWP on laboratory issues.
- Processed applications for certification and generated initial, renewal and replacement certificates for regulated laboratories.
- Tracked laboratory results of PT samples.
- Maintained the computer database of certified laboratories, including a web posting of certified laboratory list on the DWP web site.
- Maintained the central files which contain applications, certificates, audit reports and correspondence for all laboratories.

- Assisted laboratories to stay in compliance by publishing guidance documents that interpret Department rules and analytical methods.
- Maintained Standard Operating Procedures for Laboratory Certification.
- Adopted a new laboratory certification rule on April 1, 2010. This rule is now more efficient to administer, easier to interpret by the regulated community, and reflects quality systems elements from the national standard.

Goals

- To continue all ongoing operational details as mentioned above.
- To continue implementation of the new laboratory certification rule.
- To continue working towards a paperless Laboratory Certification Program.

Annual Staff Meeting and Annual Staff Merit Award

The annual staff meeting was held on July 29, 2010. We were pleased to have George Seel, Fred Lavallee, and Bruce Hunter from the Department of Environmental Protection's (DEP) Bureau of Remediation and Waste Management (BRWM) as presenters. George, Fred, and Bruce gave presentations about how the DEP deals with contaminated public drinking water systems, handles variance requests for new public water supplies near existing oil storage facilities, and provided background on the laws and regulations governing the siting of new oil storage facilities near public and private drinking water supplies. It was a great opportunity for both DWP staff and BRWM staff to gain familiarity with each other's programs and people and is another good step toward coordination and cooperation between the DWP and BRWM. We were also happy to have Scott Williams of the Volunteer Lake Monitoring Program (VLMP) as a presenter. Scott provided us with an overview of the VLMP in Maine and emphasized the importance of monitoring and protecting our surface water resources. The morning presentations concluded with a talk from DWP's Terry Trott on cyanobacteria. The staff meeting also included a team building exercise consisting of a game which challenged DWP staff to learn more about their coworkers both professionally and in their lives outside of the DWP.

An announcement and presentation of the Annual Staff Merit Award was also made. This award, given annually by the MPDWC, recognizes an employee of the Drinking Water Program who has made a significant contribution in the past year to the goals and mission of the program. Nominations are solicited and received from the drinking water "community" in Maine, including the DWP staff, other Maine water industry associations, and public water systems.

This year, the Commission was pleased to present the award to Dawn Abbott, the DWP's Enforcement Specialist. Dawn was recognized for her initiative, tirelessness, dedication, and team spirit. Dawn's tireless efforts to work together with water systems and help them return to compliance with federal and state drinking water regulations has been a true asset to the program. Dawn has teamed up with Field Inspection staff to make site visits throughout the state to various water systems under Enforcement and help them

understand and work through their requirements to come back into compliance with the DWP. Dawn's willingness to go the extra mile to help both water systems and fellow DWP staff has been a tremendous benefit to the DWP and has been noted by many people within and outside of the program.

This year, the Commission also wanted to recognize two individuals outside of the program who have been repeatedly cited for their consistent contributions to the DWP. The Commission presented a "Certificate of Appreciation" to Andy Begin recognizing his engineering skills, effective management, good humor, and lasting contributions to the DWP. Jason Pushard of the State Health and Environmental Testing Laboratory was also presented with a "Certificate of Appreciation" to recognize his outstanding sample management and general quality assurance in support of the DWP.

MPDWC Objectives for the Coming Year

The Maine Public Drinking Water Commission will continue to support and guide the Drinking Water Program, as needed, and to continue to prudently oversee the alternative funding mechanism established to fund a portion of the program's budget. However, staffing and funding will continue to be large, and growing, issues for the program. To that, the Commission in the upcoming year will:

- Continue to work toward greater State general funding to support needed positions, through meetings with administration and/or legislation as well as others in the Drinking Water Community
- Continue to support and work for the appropriate bonding for the State match of the Drinking Water State Revolving Fund
- Be a resource and an advocate for the DWP, its director and its staff
- Be knowledgeable of changing State attitudes and rules regarding the use and planning for Maine's water resources, and participate as needed in shaping new policy

Acknowledgements

The Drinking Water Commission would like to acknowledge the hard work and dedication of all employees of the Drinking Water Program. There is clearly a culture of Teamwork within the organization that is a testament to the leadership of the Director. As water issues continue to escalate nationally, statewide and locally, the stretched staff of this program quietly and efficiently do everything they can to protect the safety and reliability of Maine's over 1,900 water systems as they *Work Together for Safe Drinking Water*.

Appendix A

Maine Drinking Water Program Alternative Funding Mechanism Five Year Budget Projection

	Actual	Actual	Actual	Actual	Actual	Actual	Actual	Actual	Actual	Estimate	Estimate	Estimate	Estimate
Position / Expense Category	FY2001	FY2002	FY2003	FY2004	FY2005	FY2006	FY2007	FY2008	FY2009	FY2010	FY2011	FY2012	FY2013
Office Asst II - Dan T (50%)										13,715	13,660	14,965	16,237
Envir. Specialist III - Danielle (50%)										23,237	23,143	24,263	25,234
Envil. Specialist III - Greg (50%)										73,237	23,143	24,263	25,234
Frivir Specialist III - Kate (50%)										10,107	10,094	19,623	20,010
Envir Specialist III - Dawn (50%)										23.237	23.143	24.263	25,334
Envir. Specialist III - Haig (50%)										23,237	23,143	24,263	25,234
Envir. Specialist III - Jeff (50%)										23,237	23,143	24,263	25,234
Envir. Specialist IV - Robin (50%)										22,739	22,647	24,812	26,921
Asst Envir. Engineer - Larry (50%)										27,042	26,933	28,237	29,366
Total Salaries	146,151	158,449	165,227	187,789	157,846	184,015	180,062	203,693	223,255	220,186	219,302	233,530	244,661
Fringe Benefits	66,346	70,384	83,172	96,685	86,644	106,748	102,741	125,876	137,112	134,314	133,774	142,453	149,243
Travel	13,062	8,673	9,004	9,209	2,374	16,420	3,465	2,997	4,451	4,451	4,451	4,451	4,451
Training	1,146	25		775	702	1,200	692						
Office Equipment/Computers	6,592	10,	9,131	4,683	19,319	6,044							
Office Space (Rent, Utilities, MIS)	21,383	11,297	15,896	21,640	21,235	12,591	39,129	19,822	31,932	29,664	30,554	31,471	32,415
Supplies	1,346	20	424	5,160	4,911	3,498	1,047	2,022	139	2,575	2,652	2,732	2,814
Information Technology		2,073		973		40	12,935	22,186	30,285	30,285	30,285	30,285	30,285
Contracts								17,906	7,547				
Indirect Cost	2,020	2,033	2,607	2,138	2,306	2,350	3,282	2,636	36,595	37,543	37,543	37,543	37,543
Total Expenses	258,047	263,270	285,463	329,052	295,338	332,907	343,352	397,139	457,000	459,018	458,561	482,464	501,411
Other Sources					1	Transfer from PWSS grant	PWSS grant	43,148					
AFM Fees Collected	202,845		285,785	327,305	302,820	289,694	306,236	389,513	420,370	405,000	440,954	440,954	440,954
Total Revenues	202,845	262,766	285,785	327,305	302,820	289,694	306,236	432,661	420,370	405,000	440,954	440,954	440,954
	234,766	175	179,	179,382	177,635	159,951	116,737	79,622	113,628	76,998	22,980	5,373	(36,138)
Annual Surplus / (Deficit)	(55,202)			(1,747)		(43,213)	(37,116)	35,522	(36,630)	(54,018)	(17,607)	(41,510)	(60,457)
AFM Carryover	179,564	179,061	179,382	177,635	185,118	116,737	79,622	113,628	76,998	22,980	5,373	(36,138)	(96,595)
AFM Fee History													
Per Capita Rate	0.20		0.30	0:30	0:30	0:30	0:30	0.40	0.40	0.40	0.40	0.40	0.40
Minimum Fee	25.00		32.00	35.00	35.00	35.00	35.00	45.00	45.00	45.00	45.00	45.00	45.00
Maximum Fee	30,000	30	30,000	30,000	30,000	30,000	30,000	30,000	30,000	30,000			
Minimum Population	100		100	100	100	100	100	100	100	100	100	100	100
Bottled Water Fee	20	20	20	(see pelow)	(see pelow)	(see below)	(see below)	(see pelow)	(see below)	(see pelow)	(see below)	(see below)	(see pelow)
Estimated Revenue by Type													
Community							184,087	242,648	244,148	244,148	269,148	269,148	269,148
Non-Transient, Non-community							25,667	32,833	33,172	33,172	33,172	33,172	33,172
Transient, Non-community							71,043	91,158	91,869	91,869	91,869	91,869	91,869
Bottled Water									46,765	46,765	46,765	46,765	46,765
Small (up to 250,000 gallons)							750	1,040	1,100	1,100	1,100	1,100	1,100
Medium (250,000 to 20 million)							1,050	2,400	2,350	2,350	2,350	2,350	2,350
Large (over 20 million gallons)							6,000	7,800	15,665	15,665	15,665	15,665	15,665
Out-of-State							20,200	27,300	27,320	27,320	27,320	27,320	27,320
Water vendors (Min. \$50 Max. \$150)						100000	510	420	330	330	330	330	330
Total Estimated Kevenue (AFM Fees Billed)	(r					309,631	309,307	405,589	415,854	4.15,954	440,954	440,924	440,954